

# Data protection declaration

## Website

[Information on data processing](#)

## Social media

[LinkedIn](#), [Instagram](#), [Facebook](#)

## Customer portal, project management and administration

[Information on data processing](#)

### Table of Contents

#### Website

*Information on data processing for this website in accordance with Art. 13 of the EU General Data Protection Regulation (DSGVO) when collecting personal data from the data subject*

Basic information on data protection ↔

#### A. General

#### B. Specific

1. Privacy notice ↔
2. Basics of data processing ↔
3. Data transmission to third parties ↔
4. Data transfer to a third country or an international organization ↔
5. Storage period of your personal data ↔
6. Contact ↔
7. What rights do you have?
8. Protection of your personal data ↔
9. Protection of minors ↔
10. Server log files ↔
11. Cookies ↔
12. Consent Tool Cookie Script ↔
13. Use of Google Analytics ↔
14. Facebook Pixel for the creation of Custom Audiences ↔
15. Hotjar (hotjar Ltd.) ↔
16. Use of Google Ads conversion tracking ↔
17. Google reCAPTCHA ↔
18. Using the Tawk.to live chat system ↔
19. Use videos from YouTube ↔
20. Google Web Fonts ↔
21. Free Report, Strategy Meeting and Digital Marketing ↔
22. E-mailing digital marketing via Infusion Software
23. Newsletter ↔
24. Newsletter delivery via Infusion Software ↔
25. Disclosure of personal data for payment ↔
26. Change to our privacy policy ↔

#### Social media

##### LinkedIn

1. Information about the collection of personal data and contact details of the responsible person ↔
2. Contact Data Protection Officer Triangular-PST GmbH & Co KG ↔
3. Contact Privacy Officer LinkedIn Ireland Unlimited Company ↔
4. Data processing when contacting ↔
5. Rights of the data subject ↔
6. Right of objection in general ↔

7. Objection direct advertising ↔
8. Duration of the storage of personal data ↔

#### *Instagram*

1. Information about the collection of personal data and contact details of the person responsible ↔
2. Processing of personal data by Triangular-PST GmbH & Co KG ↔
3. Contact Data Protection Officer Triangular-PST GmbH & Co KG ↔
4. Processing of personal data by Instagram and Facebook ↔
5. Data processing for statistical and marketing purposes ↔
6. Rights of the data subject ↔
7. Right of objection in general ↔

#### *Facebook*

1. Information about the collection of personal data and contact details of the person responsible ↔
2. Contact Data Protection Officer Triangular-PST GmbH & Co KG ↔
3. The Facebook Privacy Officer ↔
4. Data processing when contacting ↔
5. Data processing for statistical and marketing purposes ↔
6. Right of objection in general ↔
7. Duration of the storage of personal data ↔

### **Customer portal, project management and administration**

#### *Information on data processing according to Art. 13 DSGVO*

1. Responsibility for data processing ↔
2. Legal basis and purpose of data processing ↔
3. Storage duration, or criteria for determining the duration ↔
4. Passing on your data to third parties ↔
5. Data transfer to a third country or an international organization ↔
6. Right of withdrawal ↔
7. Reference to the respective data subject rights ↔
8. Contact details of the data protection officer ↔
9. Reference to the right of complaint to the supervisory authority ↔

## **Website**

### ***Information on data processing for this website in accordance with Art. 13 of the EU General Data Protection Regulation (DSGVO) when collecting personal data from the data subject***

Status: 15.10.2021

#### **Basic information on data protection ↔**

Triangular-PST GmbH & Co KG is responsible for this website and, as a provider of a teleservice, must inform you at the beginning of your visit about the nature, scope and purposes of the collection and use of personal data in a precise, transparent, comprehensible and easily accessible form in clear and simple language. This content must be available to you at all times.

We attach great importance to the security of your data and compliance with data protection regulations. The processing of personal data is subject to the provisions of the currently applicable European and national laws.

With the following data protection information, we would like to show you how we handle your personal data and how you can contact us:

**Triangular-PST GmbH & Co KG**  
Bahnhofstraße 35  
86316 Friedberg  
Germany



Commercial register no.: HRB 32517

Managing Directors: Pablo Alejandro Marroquín Maldonado, Sylwia Marroquin-Sylwanowicz

Phone: +49 821 4082 1442

Email: [info@triangular-pod.com](mailto:info@triangular-pod.com)

### Our data protection officer

Sven Lenz

German data protection law firm - Datenschutzkanzlei Lenz GmbH & Co KG

Bahnhofstraße 50

87435 Kempten

Germany



If you have any questions about data protection or other data protection concerns, you are welcome to send an e-mail to the following e-mail address: [datenschutz@triangular-pod.com](mailto:datenschutz@triangular-pod.com).

## A. General

DSGVO is the German term for GDPR (General Data Protection Regulation). In the following, the abbreviation DSGVO is always used when legal texts are quoted.

For better comprehensibility, we refrain from differentiating between the genders. In the sense of equal treatment, corresponding terms apply to all genders. What the terms used, such as "personal data" or their "processing" mean, can be taken from Art. 4 of the DSGVO.

- The personal data processed within the framework of this website include
- Inventory data (e.g. name and addresses of customers)
- Contract data (e.g. services used, payment information),
- Usage data (e.g. pages visited on our website) and
- Content data (e.g. entries in online forms).

## B. Specific

### 1. Privacy notice ↔

We guarantee that we will only process your data in connection with the processing of your enquiries and for internal purposes as well as in order to provide the services requested by you or to make content available.

### 2. Basics of data processing ↔

We process your personal data only in compliance with the relevant data protection regulations. We would be pleased to show you where the above legal bases are regulated:

- Processing for the fulfilment of our services and implementation of contractual measures  
Art. 6 para. 1 letter b) DSGVO
- Processing for the fulfilment of our legal obligations  
Art. 6 para. 1 letter c) DSGVO
- Consent  
Art. 6 para. 1 letter a) and Art. 7 DSGVO
- Processing for the protection of our legitimate interests  
Art. 6 para. 1 letter f) DSGVO

### 3. Data transmission to third parties ↔

We would like to point out that data will be transferred to third parties.

Your data will only be passed on to third parties within the framework of legal requirements. We only pass on your data if this is necessary, for example, for contractual purposes or on the basis of legitimate interests in the economic and effective operation of our business.

Where we use subcontractors to provide our services, we take appropriate legal precautions and technical and organisational measures to ensure the protection of personal data in accordance with the relevant legal requirements.



#### 4. Data transfer to a third country or an international organization ↔



Third countries are countries in which the GDPR is not directly applicable law. This basically includes all countries outside the EU or the European Economic Area.

There is a data transfer to a third country or an international organisation.

Due to the fact that we use Google (various products), Facebook, Hotjar, YouTube, tawk.to on our website, data is transferred to a third country (in this case the USA) or an international organisation, insofar as you have given us your consent for this in accordance with Art. 49 para. 1 letter a) DSGVO. According to the current legal situation, the USA is considered a country with an insufficient level of data protection. There is a risk that your data will be processed by US authorities for control and monitoring purposes. Currently, there are no legal remedies against this practice.

#### 5. Storage period of your personal data ↔



We adhere to the principles of data economy and data avoidance. This means that we only store your data for as long as necessary to fulfil the aforementioned purposes or as specified by the various storage periods provided for by law. If the respective purpose ceases to apply or after expiry of the corresponding periods, your data will be routinely blocked or deleted in accordance with the statutory provisions.

#### 6. Contact ↔



If you contact us via the website, you agree to electronic communication. Personal data is processed when you contact us electronically. The information you provide will be stored exclusively for the purpose of processing the request and for possible follow-up questions.

We would like to give you the legal basis for this:

- Processing for the fulfilment of our services and implementation of contractual measures  
Art. 6 para. 1 letter b) DSGVO

We would like to point out that e-mails can be read or altered unauthorized and unnoticed during transmission. Furthermore, we draw your attention to the fact that we use software to filter unwanted e-mails (spam filter). The spam filter can reject e-mails if they have been falsely identified as spam by certain characteristics.

#### 7. What rights do you have?

- Right to information**  
You have the right to obtain information about your stored data free of charge. Upon request, we will inform you in writing which of your personal data we have stored. This also includes the origin and recipients of your data as well as the purpose of the data processing.
- Right to rectification**  
You have the right to have your data stored by us corrected if it is incorrect. In doing so, you can demand a restriction of processing, e.g. if you dispute the accuracy of your personal data.
- Right to block**  
Furthermore, you can have your data blocked. To ensure that a blocking of your data can be taken into account at any time, this data must be kept in a blocking file for control purposes.
- Right to deletion**  
You can request the deletion of your personal data, unless there is a legal obligation to retain it. If such an obligation exists, we will block your data upon request. If the relevant legal requirements exist, we will also delete your personal data without your request.
- Right to data portability**  
You have the right to request that we provide the personal data you have provided to us in a format that allows it to be transferred to another entity.
- Right of complaint to a supervisory authority**  
You have the possibility to lodge a complaint with one of the data protection supervisory authorities.



You can open the complaint form via the following link: <https://www.lda.bayern.de/de/beschwerde.html>.

Note: A complaint can also be made to any data protection supervisory authority within the EU.

g) **Right of objection**

You have the possibility at any time, for reasons arising from your particular situation, to object to the processing of your data in accordance with Art. 6 para. 1 letter e) and f); this also applies to profiling based on these provisions.



Triangular-PST GmbH & Co KG shall then no longer process your personal data, unless it can demonstrate compelling legitimate grounds for the processing which override your interests, rights and freedoms, or for the assertion, exercise or defence of legal claims.

If personal data are processed for the purpose of direct marketing, you have the right to object at any time to the processing of personal data concerning you for the purpose of such marketing; this also applies to profiling insofar as it is associated with such direct marketing. In the event of such an objection, we will no longer process your personal data for the purposes of direct advertising. For this purpose, it is sufficient to send us an appropriate e-mail.

h) **Right of revocation**

You have the possibility at any time to revoke your consent to the processing of your data with effect for the future without giving reasons. You will not suffer any disadvantages as a result of the revocation. For this purpose, it is sufficient to send us an appropriate e-mail.

However, such a revocation shall not affect the lawfulness of the processing carried out on the legal basis of Art. 6 para. 1 letter a) of the DSGVO up to the time of the revocation.

To exercise your data protection rights, please send us an e-mail to the following address: [datenschutz@triangular-pod.com](mailto:datenschutz@triangular-pod.com).

## 8. Protection of your personal data ↔

We take contractual, technical and organisational security measures in accordance with the state of the art to ensure that data protection laws are complied with and thus to protect the processed data against accidental or intentional manipulation, loss, destruction or against access by unauthorised persons.



The security measures include in particular the encrypted transmission of data between your browser and our server. For this purpose, a 128-bit SSL (AES 128) encryption technology is used.



Your personal data will be protected within the scope of the following points (excerpt):

a) **Maintaining the confidentiality of your personal data**

To maintain the confidentiality of your data stored with us, we have taken various measures to control access, entry and access control.



b) **Maintaining the integrity of your personal data**

To maintain the integrity of your data stored with us, we have taken various measures to control disclosure and input.

c) **Maintaining the availability of your personal data**

In order to maintain the availability of your data stored with us, we have taken various measures for order and availability control.

The security measures in place are continuously improved in line with technological developments. Despite these precautions, due to the insecure nature of the Internet, we cannot guarantee the security of your data transmission to our website. Therefore, any data transmission by you is at your own risk.

## 9. Protection of minors ↔

Personal information may only be provided to us by persons who have not yet reached the age of 16 with the express consent of their legal guardians. This data will be processed in accordance with this data protection notice.



## 10. Server log files ↔

The provider of the pages automatically collects and stores information in so-called server log files, which your browser automatically transmits to us. These are:



- Browser type and browser version
- operating system used
- referrer URL
- Host name of the accessing computer
- Time of the server request
- IP address

This data is not merged with other data sources.

The basis for data processing is our legitimate interest in accordance with Art. 6 Para. 1 letter f) DSGVO.

## 11. Cookies ↔



Cookies are small text files that are stored locally in the cache of your Internet browser. The cookies enable, for example, the recognition of the internet browser. The files are used to help the browser navigate through the website and to make full use of all functions.

## 12. Consent Tool Cookie Script ↔

This website uses the cookie consent tool "Cookie Script" from Objectis Ltd, Žalgirio st. 88, 09303 Vilnius, Lithuania to obtain effective user consent for cookies and cookie-based applications that require consent. By integrating a corresponding JavaScript code, users are shown a banner when they call up the page, in which they can give their consent to certain cookies and/or cookie-based applications by ticking the appropriate box. Through the use of the tool, all cookies/services requiring consent are only loaded when the respective user grants the corresponding consent by ticking the corresponding box. This ensures that such cookies are only set on the respective user's end device if consent has been granted.

The tool sets technically necessary cookies to save your cookie preferences. Personal user data is not processed in the process.

## 13. Use of Google Analytics ↔

If you have given your consent, this website uses Google Analytics, a web analytics service provided by Google LLC. The responsible service provider in the EU is Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland ("Google").

Google Analytics uses cookies that enable an analysis of your use of our website. The information collected by means of the cookies about your use of this website is usually transferred to a Google server in the USA and stored there.

We use the function "anonymizeIP" (so-called IP masking): Due to the activation of IP anonymization on this website, your IP address will be shortened by Google within member states of the European Union or in other contracting states of the Agreement on the European Economic Area. Only in exceptional cases will the full IP address be transmitted to a Google server in the USA and shortened there. The IP address transmitted by your browser within the scope of Google Analytics will not be merged with other Google data.

During your visit to the website, the following data is collected, among other things:

- the pages you visit, your "click path"
- Achievement of "website goals" (conversions, e.g. newsletter sign-ups, downloads, purchases)
- Your user behavior (for example, clicks, dwell time, bounce rates)
- Your approximate location (region)
- Your IP address (in shortened form)
- technical information about your browser and the end devices you use (e.g. language setting, screen resolution)
- Your Internet provider
- the referrer URL (via which website/advertising medium you came to this website)

On behalf of the operator of this website, Google will use this information for the purpose of evaluating your use of the website, and compiling reports on website activity. The reports provided by Google Analytics are used to analyse the performance of our website and the success of our marketing campaigns.

The recipient of the data is Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland as an order processor. Google LLC, based in California, USA, and possibly US authorities may access the data stored by Google. A transfer of data to the USA cannot be ruled out.

The data sent by us and linked to cookies are automatically deleted after 14 months. The deletion of data whose retention period has been reached takes place automatically once a month. You can also prevent the collection of data generated by

the cookie and related to your use of the website (including your IP address) to Google and the processing of this data by Google by clicking on the following link

- a) do not give your consent to the setting of the cookie or
- b) you can download and install the browser add-on to disable Google Analytics here

<https://tools.google.com/dlpage/gaoptout?hl=de>

You can also prevent the storage of cookies by configuring your browser software accordingly. However, if you configure your browser to refuse all cookies, you may experience some limitations in functionality on this and other websites.

Your consent applies to this data processing, Art. 6 para. 1 clause 1 letter a) DSGVO. You can revoke your consent at any time with effect for the future. To exercise your revocation, deactivate this service in the "Cookie Consent Tool" provided on the website.

The fact that we use Google Analytics on our website means that data is transferred to a third country (in this case the USA) or an international organisation, provided that you have given us your consent in accordance with Art. 49 para. 1 letter a) DSGVO. According to the current legal situation, the USA is considered a country with an insufficient level of data protection. There is a risk that your data will be processed by US authorities for control and monitoring purposes. Currently, there are no legal remedies against this practice.

For more information on Google Analytics' terms of use and Google's privacy policy, please visit <https://marketingplatform.google.com/about/analytics/terms/de/> and <https://policies.google.com/?hl=de>.

#### 14. Facebook Pixel for the creation of Custom Audiences ↔

Within our online offer, the so-called "Facebook pixel" of the social network Facebook is used, which is operated by Facebook Ireland Limited, 4 Grand Canal Quare, Dublin 2, Ireland ("Facebook").

If a user clicks on an ad placed by us that is played on Facebook, an addition is added to the URL of our linked page by Facebook Pixel. If our site allows data to be shared with Facebook via Pixel, this URL parameter is inscribed in the user's browser via a cookie that our linked site sets itself. This cookie is then read by Facebook Pixel and enables the data to be forwarded to Facebook.

The data processing associated with the use of the Facebook Pixel is only carried out with your express consent in accordance with Art. 6 para. 1 letter a) DSGVO. You can revoke your consent at any time with effect for the future. To exercise your revocation, remove the checkmark set in the "Cookie Consent Tool" integrated on the website under "Targeting".

The fact that we use Facebook Pixel on our website means that data is transferred to a third country (in this case the USA) or an international organisation, insofar as you have given us your consent in accordance with Art. 49 para. 1 letter a) DSGVO. According to the current legal situation, the USA is considered a country with an insufficient level of data protection. There is a risk that your data will be processed by US authorities for control and monitoring purposes. Currently, there are no legal remedies against this practice.

With the help of the Facebook pixel, it is possible for Facebook to determine the visitors to our online offer as a target group for the display of advertisements (so-called "Facebook ads"). Accordingly, we use the Facebook pixel to display the Facebook ads placed by us only to those Facebook users who have also shown an interest in our online offer or who have certain characteristics (e.g. interests in certain topics or products determined on the basis of the websites visited), which we transmit to Facebook (so-called "Custom Audiences"). With the help of the Facebook Pixel, we also want to ensure that our Facebook Ads correspond to the potential interest of users and do not have a harassing effect. This allows us to further evaluate the effectiveness of the Facebook ads for statistical and market research purposes by tracking whether users were redirected to our website after clicking on a Facebook ad (so-called "conversion").

The collected data is anonymous for us, so we cannot draw any conclusions about the identity of the user. However, the data is stored and processed by Facebook, so that a connection to the respective user profile is possible and Facebook can use the data for its own advertising purposes, according to the Facebook data usage policy (<https://www.facebook.com/about/privacy/>). The data can enable Facebook and its partners to place advertisements on and outside of Facebook.

#### 15. Hotjar (hotjar Ltd.) ↔

This website uses the web analytics service Hotjar provided by Hotjar Ltd, a European company based in Malta (Hotjar Ltd, Level 2, St Julians Business Centre, 3, Elia Zammit Street, St Julians STJ 1000, Malta, Europe Tel: +1 (855) 464-6788).

With this tool, movements on the websites on which Hotjar is used can be tracked (so-called heat maps). For example, it is possible to see how far users scroll and which buttons users click on how often. Furthermore, with the help of the tool it is also possible to obtain feedback directly from the users of the website. In this way, we obtain valuable information to make our websites even faster and more customer-friendly. The above analysis is carried out on the basis of our legitimate interests in optimisation and marketing purposes and the interest-based design of our website in accordance with Art. 6 Para. 1 letter

f) DSGVO. We pay particular attention to the protection of your personal data when using this tool. For example, we can only track which buttons you click and how far you scroll. Areas of the websites in which personal data of you or third parties are displayed are automatically hidden by Hotjar and are therefore not traceable at any time.

As far as legally required, we have obtained your consent for the processing of your data as described above in accordance with Art. 6 Para. 1 letter a) DSGVO.

Data is transferred to a third country (in this case the USA) or to an international organisation if you have given us your consent in accordance with Art. 49 para. 1 letter a) DSGVO. According to the current legal situation, the USA is considered a country with an insufficient level of data protection. There is a risk that your data will be processed by US authorities for control and monitoring purposes. Currently, there are no legal remedies against this practice.

You can revoke your given consent at any time with effect for the future. To exercise your revocation, deactivate this service in the "Cookie Consent Tool" provided on the website.

Hotjar also offers each user the option of using a "Do Not Track header" to prevent the use of the Hotjar tool so that no data is recorded about the visit to the respective website. This is a setting that supports all common browsers in the respective current version. To do this, your browser sends a request to Hotjar with the information to deactivate the tracking of the respective user. If you use our website with different browsers/computers, you must set up the "Do Not Track header" separately for each of these browsers/computers.

Detailed instructions with information about your browser can be found at: <https://www.hotjar.com/opt-out>  
For more information about Hotjar Ltd. and the Hotjar tool, please visit: <https://www.hotjar.com>  
The privacy policy of Hotjar Ltd. can be found at: <https://www.hotjar.com/privacy>

## 16. Use of Google Ads conversion tracking ↔

This website uses the online advertising program "Google Ads" and within the scope of Google Ads the conversion tracking of Google Ireland Limited, Gordon House, 4 Barrow St, Dublin, D04 E5W5, Ireland ("Google"). We use the offer of Google Ads to draw attention to our attractive offers with the help of advertising media (so-called Google Adwords) on external websites. We can determine how successful the individual advertising measures are in relation to the data of the advertising campaigns. In this way, we pursue the aim of displaying advertising that is of interest to you, making our website more interesting for you and achieving a fair calculation of the advertising costs incurred.

The cookie for conversion tracking is set when a user clicks on an ad placed by Google. Cookies are small text files that are stored on your terminal device. These cookies usually lose their validity after 30 days and are not used for personal identification. If the user visits certain pages of this website and the cookie has not yet expired, Google and we can recognize that the user clicked on the ad and was redirected to this page. Each Google Ads customer receives a different cookie. Therefore, cookies cannot be tracked across Google Ads customers' websites. The information collected using the conversion cookie is used to generate conversion statistics for Google Ads customers who have opted in to conversion tracking. Clients will learn the total number of users who clicked on their ad and were redirected to a page tagged with a conversion tracking tag. However, they do not receive information that personally identifies users.

Details on the processing triggered by Google Ads Conversion Tracking and on Google's handling of data from websites can be found here: <https://policies.google.com/technologies/partner-sites>.

As far as legally required, we have obtained your consent for the processing of your data in accordance with Art. 6 para. 1 letter a) DSGVO. You can revoke your consent at any time with effect for the future. To exercise your revocation, deactivate this service in the "Cookie Consent Tool" provided on the website.

The fact that we use Google Ads Conversion on our website means that data is transferred to a third country (in this case the USA) or an international organisation, provided that you have given us your consent in accordance with Art. 49 para. 1 letter a) DSGVO. According to the current legal situation, the USA is considered a country with an insufficient level of data protection. There is a risk that your data will be processed by US authorities for control and monitoring purposes. Currently, there are no legal remedies against this practice.

You can find more information about Google's privacy policy at the following web address:

<https://www.google.de/policies/privacy/>.

You can permanently object to the setting of cookies by Google Ads conversion tracking by downloading and installing the Google browser plug-in available at the following link: <https://www.google.com/settings/ads/plugin?hl=de>.

## 17. Google reCAPTCHA ↔

On this website we use the reCAPTCHA function of Google Ireland Limited, Gordon House, 4 Barrow St, Dublin, D04 E5W5, Ireland ("Google"). This function is primarily used to distinguish whether an input is made by a natural person or is abused by

machine and automated processing. The service includes the sending of the IP address and possibly other data required by Google for the reCAPTCHA service to the use of Google reCAPTCHA may also involve the transmission of personal data to the servers of Google LLC. in the USA.

As far as legally required, we have obtained your consent for the processing of your data as described above in accordance with Art. 6 para. 1 letter a) DSGVO. You can revoke your consent at any time with effect for the future. To exercise your revocation, deactivate this service in the "Cookie Consent Tool" provided on the website or the option in the privacy notices.

The fact that we use Google reCAPTCHA on our website means that data is transferred to a third country (in this case the USA) or an international organisation, insofar as you have given us your consent to do so in accordance with Art. 49 para. 1 letter a) DSGVO. According to the current legal situation, the USA is considered a country with an insufficient level of data protection. There is a risk that your data will be processed by US authorities for control and monitoring purposes. Currently, there are no legal remedies against this practice.

Further information about Google reCAPTCHA as well as Google's privacy policy can be found at:  
<https://www.google.com/intl/de/policies/privacy/>.

#### 18. Using the Tawk.to live chat system ↔

This website uses technology provided by tawk.to Inc. 187 East Warm Springs Rd, SB298 Las Vegas, NV, 89119, USA (www.tawk.to) to collect and store anonymized data for web analytics purposes and to operate the live chat system for responding to live support requests. Usage profiles can be created from this anonymized data under a pseudonym. Cookies can be used for this purpose. Cookies are small text files that are stored locally in the cache of the site visitor's Internet browser. The cookies enable the recognition of the Internet browser.

As far as legally required, we have obtained your consent for the processing of your data as described above in accordance with Art. 6 Para. 1 letter a) DSGVO.

Data is transferred to a third country (in this case the USA) or to an international organisation if you have given us your consent in accordance with Art. 49 para. 1 letter a) DSGVO. According to the current legal situation, the USA is considered a country with an insufficient level of data protection. There is a risk that your data will be processed by US authorities for control and monitoring purposes. Currently, there are no legal remedies against this practice.

You can revoke your given consent at any time with effect for the future. To exercise your revocation, deactivate this service in the "Cookie Consent Tool" provided on the website.

The data collected with the tawk.to technologies will not be used to personally identify the visitor of this website without the separately granted consent of the person concerned and will not be merged with personal data about the bearer of the pseudonym. In order to avoid the storage of tawk.to cookies, you can set your internet browser in such a way that no cookies can be stored on your computer in the future or that cookies that have already been stored are deleted. However, switching off all cookies can lead to the fact that some functions on our Internet pages can no longer be carried out. You can object to the collection and storage of data for the purpose of creating a pseudonymised user profile at any time with effect for the future by sending us your objection informally by e-mail to the e-mail address given in the imprint.

#### 19. Use videos from YouTube ↔

We use the YouTube implementation function to display and play videos from the provider "YouTube", which belongs to Google Ireland Limited, Gordon House, 4 Barrow St, Dublin, D04 E5W5, Ireland ("Google").

As far as legally required, we have obtained your consent for the processing of your data as described above in accordance with Art. 6 Para. 1 letter a) DSGVO.

Data is transferred to a third country (in this case the USA) or to an international organisation if you have given us your consent in accordance with Art. 49 para. 1 letter a) DSGVO. According to the current legal situation, the USA is considered a country with an insufficient level of data protection. There is a risk that your data will be processed by US authorities for control and monitoring purposes. Currently, there are no legal remedies against this practice.

You can revoke your given consent at any time with effect for the future. To exercise your revocation, deactivate this service in the "Cookie Consent Tool" provided on the website.

According to information from "YouTube", these are used, among other things, to collect video statistics, to improve user-friendliness and to prevent abusive behaviour. If you are logged in to Google, your data will be directly assigned to your account when you click on a video. If you do not want the assignment with your profile at YouTube, you must log out before activating the button.

Google stores your data (even for users who are not logged in) as usage profiles and evaluates them. You have the right to object to the creation of these user profiles, whereby you must contact YouTube to exercise this right. Independently of a playback of the embedded videos, a connection to the Google network is established each time this website is called up, which may trigger further data processing operations without our influence. Further information on data protection at "YouTube" can be found in the provider's privacy policy at: <https://www.google.de/intl/de/policies/privacy>.

## 20. Google Web Fonts ↔

This site uses so-called web fonts provided by Google Ireland Limited, Gordon House, 4 Barrow St, Dublin, D04 E5W5, Ireland ("Google") for the uniform display of fonts. When you call up a page, your browser loads the required web fonts into its browser cache in order to display texts and fonts correctly.

For this purpose, the browser you use must connect to Google's servers. This may also result in the transmission of personal data to the servers of Google LLC. in the USA. In this way, Google obtains knowledge that our website was accessed via your IP address. Google Web Fonts are used in the interest of a uniform and appealing presentation of our online offers.

As far as legally required, we have obtained your consent for the processing of your data as described above in accordance with Art. 6 Para. 1 letter a) DSGVO.

Data is transferred to a third country (in this case the USA) or to an international organisation if you have given us your consent in accordance with Art. 49 para. 1 letter a) DSGVO. According to the current legal situation, the USA is considered a country with an insufficient level of data protection. There is a risk that your data will be processed by US authorities for control and monitoring purposes. Currently, there are no legal remedies against this practice.

You can revoke your consent at any time with effect for the future. To exercise your revocation, deactivate this service in the "Cookie Consent Tool" provided on the website or in the settings in the privacy notices.

If your browser does not support web fonts, a default font from your computer will be used. For more information about Google Web Fonts, please visit <https://developers.google.com/fonts/faq> and read Google's privacy policy <https://www.google.com/policies/privacy/>.

## 21. Free Report, Strategy Meeting and Digital Marketing ↔

If you register to receive a Free Report or to attend a Strategy Meeting, you agree that we may process the data you provide for the purpose of processing the request(s) by Triangular-PST GmbH & Co. KG, Bahnhofstraße 35, 86316 Friedberg, for the purpose of processing the enquiries. Your data will be processed strictly for the intended purpose.

If you also agree that we may store the data you have provided for our own advertising purposes and use it to send you information on an irregular basis (by e-mail and/or post), you will be added to our e-mail distribution list for digital marketing. Personal data will be collected for this purpose. In addition to your e-mail address, it is obligatory to provide a telephone number where you can be reached in order to send the messages.

You can unsubscribe from digital marketing at any time via the link provided for this purpose in the e-mail or by sending a corresponding message to us, e-mail [unsubscribe@triangular-pod.com](mailto:unsubscribe@triangular-pod.com). After unsubscribing, your email address will be deleted immediately from our digital marketing distribution list and included in a blocking file to ensure revocation.

For the sending of a Free Report, the arrangement of a strategy meeting and, if applicable, the inclusion in the distribution list for digital marketing, we use the so-called double opt-in procedure for registration. This means that we will only send you an e-mail or contact you by telephone or other means if you have expressly confirmed that you want us to process your request. We will then send you a confirmation email asking you to click on the relevant link to confirm that you agree to us processing your enquiry and that you may receive promotional emails from us.

By activating the confirmation link, you give us your consent for the use of your personal data in accordance with Art. 6 para. 1 letter a) DSGVO. When you register for digital marketing, we store your IP address entered by your internet service provider (ISP) as well as the date and time of registration in order to be able to trace any possible misuse of your email address at a later date.

## 22. E-mailing digital marketing via Infusion Software

Our digital marketing e-mails are sent via the technical service provider Infusion Software Inc, 1260 S. Spectrum Blvd, Chandler, AZ 85286, USA, to whom we pass on the data you provided when registering for digital marketing. This transfer takes place in accordance with Art. 6 para. 1 letter f) DSGVO and serves our legitimate interest in the use of a promotionally effective, secure and user-friendly exchange of information. The data you enter (e.g. e-mail address) is stored on Infusion Software's servers in the USA.

E-mail tracking: If you have expressly consented beforehand, e-mail tracking (also called web beacons or tracking pixels) is used. When delivering the e-mails, the external server can then record certain data of the recipient, e.g. the time of the

retrieval, the IP address or details of the e-mail program used (client). The name of the image file is individualised for each e-mail recipient by appending a unique ID. The e-mail sender notes which ID belongs to which e-mail address and can thus determine which newsletter recipient has just opened the e-mail when the image is retrieved.

With e-mail tracking, user behaviour is recorded pseudonymously. This involves the following pseudonymised data: Completion of registration, submission of a form, contact, lead, searches on the website, pages visited, clicks on the website, making an appointment, location (country and city), date and time.

You can view Infusion Software Inc's privacy notice here: <https://keap.com/legal/data-protection-faq> and here: <https://keap.com/legal/privacy-policy>.

### 23. Newsletter ↔



If you register for our e-mail newsletter, we will regularly send you information about our offers. Personal data will be collected for this purpose. Mandatory information for sending the newsletter is only your e-mail address. The specification of further data is voluntary and will be used to address you personally. This data will be used by us for our own advertising purposes in the form of the e-mail newsletter, provided that you have expressly consented to this.

We use the so-called double opt-in procedure for inclusion in the newsletter distribution list. This means that we will only send you an e-mail newsletter once you have expressly confirmed that you consent to receiving the newsletter. We will then send you a confirmation e-mail asking you to confirm that you wish to receive the newsletter in the future by clicking on the corresponding link.

By activating the confirmation link, you give us your consent for the use of your personal data in accordance with Art. 6 para. 1 letter a) DSGVO. When you register for the newsletter, we store your IP address entered by your Internet service provider (ISP) as well as the date and time of registration in order to be able to trace any possible misuse of your e-mail address at a later date.

You can unsubscribe from the newsletter at any time via the link provided for this purpose in the newsletter or by sending a corresponding message to us, e-mail [unsubscribe@triangular-pod.com](mailto:unsubscribe@triangular-pod.com). After unsubscribing, your e-mail address will be deleted immediately from our newsletter distribution list and included in a blocking file to ensure revocation.

### 24. Newsletter delivery via Infusion Software ↔

Our newsletter and marketing e-mails are sent via the technical service provider Infusion Software Inc, 1260 S. Spectrum Blvd, Chandler, AZ 85286, USA, to whom we pass on the data you provided when registering for the newsletter. This transfer takes place in accordance with Art. 6 Para. 1 letter f) DSGVO and serves our legitimate interest in using a newsletter system that is effective in advertising, secure and user-friendly. The data you enter (e.g. e-mail address) will be stored on Infusion Software's servers in the United States.

Newsletter tracking: If you have expressly consented beforehand, newsletter tracking (also called web beacons or tracking pixels) is used. When delivering the newsletter, the external server can then record certain data of the recipient, e.g. the time of the retrieval, the IP address or details of the e-mail program used (client). The name of the image file is individualized for each e-mail recipient by appending a unique ID. The email sender remembers which ID belongs to which email address and can thus determine which newsletter recipient has just opened the email when the image is retrieved.

In newsletter tracking, user behaviour is recorded pseudonymously. This involves the following pseudonymized data: Completion of registration, submission of a form, contact, lead, searches on the website, pages visited, clicks on the website, appointment, location (country and city), date and time.

You can view Infusion Software Inc's privacy notice here: <https://keap.com/legal/data-protection-faq> and here: <https://keap.com/legal/privacy-policy>.

### 25. Disclosure of personal data for payment ↔

Payment is processed via the payment service provider Stripe, Inc., 510 Townsend Street, San Francisco, CA 94103, USA. In the course of the ordering process, the information you provide, together with information about the order (name, address, account number, bank routing number, credit card number, if applicable, invoice amount, currency and transaction number) will be passed on. Your data will only be passed on for the purpose of payment processing with the payment service provider Stripe, Inc. You can find more information about the data protection of Stripe, Inc. here <https://stripe.com/de/privacy>.

### 26. Change to our privacy policy ↔

We reserve the right to adapt our data protection information at short notice so that it always complies with the current legal requirements or in order to implement changes to our services. This may, for example, concern the introduction of new services. The new data protection information will then apply to your next visit.



# Social media

## Information on data protection and privacy policy

### **LinkedIn**

Status: 15.10.2021

#### **1. Information about the collection of personal data and contact details of the responsible person ↔**

In the following, we inform you about the handling of your personal data. Here, personal data is any data with which you can be personally identified. Please check carefully which personal data you share with us via the social medium LinkedIn. We expressly point out that LinkedIn stores the data of its users (e.g. personal information, IP address, etc.) and may also use this data for business purposes. You can find more information on LinkedIn's data processing in LinkedIn's privacy policy at [https://www.linkedin.com/legal/privacy-policy?trk=hb\\_ft\\_priv](https://www.linkedin.com/legal/privacy-policy?trk=hb_ft_priv).

We have no influence on the data collection and further processing by LinkedIn. Furthermore, it is not apparent to us to what extent, where and for how long the data is stored, to what extent LinkedIn complies with existing deletion obligations, what evaluations and links are made with the data and to whom the data is passed on. If you would like to avoid LinkedIn processing personal data that you have transmitted to us, please contact us by other means. You can find our full contact details in our imprint on LinkedIn.

The person responsible for data processing within the meaning of the General Data Protection Regulation (GDPR) is Triangular-PST GmbH & Co KG, Bahnhofstraße 35, 86316 Friedberg, Germany, Tel.: +49 821 4082 1442, e-mail: [datenschutz@triangular-pod.com](mailto:datenschutz@triangular-pod.com), insofar as we exclusively process the data transmitted to us by you via LinkedIn ourselves.

Insofar as the data you provide to us via LinkedIn is also or exclusively processed by LinkedIn, LinkedIn Ireland Unlimited Company, Wilton Place, Dublin 2, Ireland is also the data controller within the meaning of the General Data Protection Regulation (GDPR), provided you are a resident of a country of the European Union, Iceland, Liechtenstein, Norway or Switzerland. If you are resident in another country, LinkedIn Corporation, 2029 Stierlin Court, Mountain View, CA 94043, USA is also the data controller within the meaning of the GDPR in addition to us. The controller is the natural or legal person who alone or jointly with others determines the purposes and means of the processing of personal data.

#### **2. Contact Data Protection Officer Triangular-PST GmbH & Co KG ↔**

Sven Lenz

German data protection law firm - Datenschutzkanzlei Lenz GmbH & Co KG  
Bahnhofstraße 50, 87435 Kempten, Germany

If you have any questions about data protection or other data protection concerns, you are welcome to send an e-mail to the following e-mail address: [datenschutz@triangular-pod.com](mailto:datenschutz@triangular-pod.com).

#### **3. Contact Privacy Officer LinkedIn Ireland Unlimited Company ↔**

LinkedIn Ireland Unlimited Company or LinkedIn Corporation can be contacted via the contact form available at the following link:

<https://www.linkedin.com/help/linkedin/ask/TSO-DPO>

#### **4. Data processing when contacting ↔**

We ourselves collect personal data when you contact us via contact form or messenger, for example. You can see which data we collect when you contact us via the contact form from the relevant contact form. This data is stored and used exclusively for the purpose of responding to your request or for contacting you and the associated technical administration. The legal basis for processing the data is our legitimate interest in responding to your request in accordance with Art. 6 para. 1 letter f) DSGVO. If your contact aims at the conclusion of a contract, the additional legal basis for the processing is Art. 6 para. 1 letter b) DSGVO. Your data will be deleted after final processing of your request, provided that there are no legal obligations to retain data. We assume that processing is complete if it can be inferred from the circumstances that the matter in question has been conclusively clarified.

## 5. Rights of the data subject ↔

The applicable data protection law grants you comprehensive data subject rights (rights of information and intervention) vis-à-vis the controller with regard to the processing of your personal data, which we inform you about below:

- Right to information according to Art. 15 DSGVO;
- Right to rectification pursuant to Art. 16 DSGVO;
- Right to erasure in accordance with Art. 17 DSGVO;
- Right to restriction of processing pursuant to Art. 18 DSGVO;
- Right to information pursuant to Art. 19 of the DSGVO;
- Right to data portability according to Art. 20 DSGVO;
- Right to revoke consent given in accordance with Art. 21 DSGVO

## 6. Right of objection in general ↔

If we process your personal data within the framework of a balancing of interests on the basis of our overriding legitimate interest, you have the right to object to this processing with effect for the future at any time for reasons arising from your particular situation. If you exercise your right to object, we will stop processing the data concerned. However, we reserve the right to continue processing if we can demonstrate compelling legitimate grounds for the processing which override your interests, fundamental rights and freedoms, or if the processing serves the assertion, exercise or defence of legal claims.

## 7. Objection direct advertising ↔

If your personal data is processed by us for the purpose of direct marketing, you have the right to object at any time to the processing of personal data concerning you for the purpose of such marketing. You can exercise the objection as already explained above under "Objection in general". If you exercise your right to object, we will stop processing the data concerned for direct marketing purposes.

## 8. Duration of the storage of personal data ↔

The duration of the storage of personal data is determined on the basis of the respective legal basis, the purpose of processing and - if relevant - additionally on the basis of the respective statutory retention period (e.g. retention periods under commercial and tax law). When personal data is processed on the basis of explicit consent pursuant to Art. 6 para. 1 letter a) DSGVO, this data is stored until the person concerned revokes his or her consent. If there are statutory retention periods for data that is processed within the scope of legal or quasi-legal obligations on the basis of Art. 6 para. 1 letter b) DSGVO, this data will be routinely deleted after expiry of the retention periods, provided that it is no longer required for the performance of the contract or the initiation of the contract and/or there is no legitimate interest on our part in the continued storage.

When processing personal data on the basis of Art. 6 para. 1 letter f) DSGVO, this data is stored until the data subject exercises his or her right to object pursuant to Art. 21 para. 1 DSGVO, unless we can demonstrate compelling legitimate grounds for the processing which override the interests, rights and freedoms of the data subject, or the processing serves to assert, exercise or defend legal claims. When processing personal data for the purpose of direct marketing on the basis of Art. 6 para. 1 letter f) DSGVO, this data will be stored until the data subject exercises his or her right to object pursuant to Art. 21 para. 2 DSGVO. Unless otherwise stated in the other information in this statement about specific processing situations, stored personal data will otherwise be deleted when it is no longer necessary for the purposes for which it was collected or otherwise processed.

## **Instagram**

Status: 15.10.2021

### 1. Information about the collection of personal data and contact details of the person responsible ↔

In the following, we inform you about the handling of your personal data in connection with the Instagram page of Triangular-PST GmbH & Co KG. Here, personal data is all data with which you can be personally identified.

For the processing of your personal data on this website, we are together with Instagram Inc. ("Instagram") "joint controllers" in the sense of Art. 26 DS-GVO, because we make use of offered information services and the technical platform and services of Instagram Inc., 1601 Willow Road, Menlo Park, CA, 94025, USA.

Instagram is a part of the Facebook group of companies and shares infrastructure, systems, technology, and may share personal information (e.g., personal information, IP numbers, etc.) with Facebook and other Facebook companies.

We process personal data ourselves via our Instagram page (see 2.), but at the same time data processing is also carried out by Facebook as the operator of the Instagram platform (see 4.).

Please check carefully what personal data you share with us via Instagram. As long as you are logged in with your Instagram account and visit our Instagram page, Instagram can associate this with your Facebook profile. We expressly point out that Instagram shares this data with Facebook and its affiliated companies. Facebook stores the data of its users (e.g. personal information, IP address, etc.) and may also use this for business purposes.

For more information on data processing by Instagram and also Facebook, please visit <https://www.instagram.com/legal/privacy/> and <https://de-de.facebook.com/policy.php>.

## 2. Processing of personal data by Triangular-PST GmbH & Co KG ↔

The person responsible for data processing within the meaning of the General Data Protection Regulation (DSGVO) is Triangular-PST GmbH & Co. KG, Bahnhofstraße 35, 86316 Friedberg, Germany, Tel.: +49 821 4082 1442, e-mail: [info@triangular-pod.com](mailto:info@triangular-pod.com), insofar as we exclusively process the data transmitted to us by you via Facebook ourselves.

## 3. Contact Data Protection Officer Triangular-PST GmbH & Co KG ↔

Sven Lenz

German data protection law firm - Datenschutzkanzlei Lenz GmbH & Co KG  
Bahnhofstraße 50, 87435 Kempten, Germany

If you have any questions about data protection or other data protection concerns, you are welcome to send an e-mail to the following e-mail address: [datenschutz@triangular-pod.com](mailto:datenschutz@triangular-pod.com).

We ourselves collect personal data when you contact us (e.g. via a contact form or by liking and commenting on our posts or following our profile). You can see which data we collect when you contact us via contact form from the relevant contact form. This data is stored and used exclusively for the purpose of answering your request or for contacting you and the related technical administration. The legal basis for the processing of the data is our legitimate interest in responding to your request in accordance with Art. 6 Para. 1 letter f) DSGVO.

If your contact aims at the conclusion of a contract, the additional legal basis for the processing is Art. 6 para. 1 letter b) DSGVO. Your data will be deleted after final processing of your request, unless there are legal obligations to retain data. We assume that processing is complete if it can be inferred from the circumstances that the matter in question has been conclusively clarified.

We pass on your payment data to the commissioned credit institution within the scope of payment processing, insofar as this is necessary for payment processing. The legal basis for the transfer of data is here Art. 6 para. 1 letter b) DSGVO.

In the case of contracts for the delivery of goods, we pass on the personal data we have collected to the transport company commissioned with the delivery, insofar as this is necessary for the delivery of the goods, as part of the contract processing.

The data you enter on Instagram, in particular your username and the content published under your account, are also processed by us insofar as we link or respond to your posts, if applicable, or also write posts from us that refer to your account. The data freely published and disseminated by you on Instagram are thus included by us in our offer and made accessible to our followers.

However, the recipient of the data that you enter or disclose on our Instagram page is also Instagram or Facebook, which may use it for their own purposes and pass it on to third parties under their responsibility. The recipient of published personal data, e.g. in the context of posts, is also the public, i.e. potentially anyone.

The duration of the storage of personal data is determined on the basis of the respective legal basis, the purpose of processing and - if relevant - additionally on the basis of the respective statutory retention period (e.g. retention periods under commercial and tax law). When personal data is processed on the basis of explicit consent pursuant to Art. 6 para. 1 letter a) DSGVO, this data is stored until the person concerned revokes his or her consent. If there are legal retention periods for data that is processed within the scope of legal business or similar obligations on the basis of Art. 6 para. 1 letter b) DSGVO, this data will be routinely deleted after expiry of the retention periods, insofar as it is no longer required for the fulfilment of the contract or the initiation of the contract and/or there is no justified interest on our part in the continued storage.

When processing personal data on the basis of Art. 6 para. 1 letter f) DSGVO, this data is stored until the data subject exercises his or her right to object pursuant to Art. 21 para. 1 DSGVO, unless we can demonstrate compelling legitimate grounds for the processing which override the interests, rights and freedoms of the data subject, or the processing serves to assert, exercise or defend legal claims.

When processing personal data for the purpose of direct marketing on the basis of Art. 6 para. 1 letter f) DSGVO, this data will be stored until the data subject exercises his or her right to object pursuant to Art. 21 para. 2 DSGVO. Unless otherwise stated in the other information in this statement about specific processing situations, stored personal data will otherwise be deleted when it is no longer necessary for the purposes for which it was collected or otherwise processed.

#### 4. Processing of personal data by Instagram and Facebook ↔

Insofar as the data you provide to us via Facebook is also or exclusively processed by Facebook (Insights data), Facebook Ireland Ltd, 4 Grand Canal Square, Grand Canal Harbour, Dublin 2 Ireland, is also the data controller within the meaning of the General Data Protection Regulation (GDPR) in addition to us. In this respect, the data processing takes place on the basis of an agreement between jointly responsible parties pursuant to Art. 26 DSGVO, which you can view here:

[https://www.facebook.com/legal/terms/page\\_controller\\_addendum](https://www.facebook.com/legal/terms/page_controller_addendum).

The Facebook Privacy Officer can be contacted via the online contact form provided by Facebook at

<https://www.facebook.com/help/contact/540977946302970>.

The Instagram page of Triangular-PST GmbH & Co KG is part of the online platform operated by Facebook at <https://www.instagram.com/>. The purposes of the data processing by Instagram associated with this platform (in particular the operation of the platform itself and the placement of advertisements on the platform), the legal bases for this and the legitimate interests pursued in doing so are described in Instagram's data policy at

<https://www.instagram.com/legal/privacy/>.

We have no influence on the data collection and further processing by Instagram. Furthermore, it is not apparent to us to what extent, where and for how long the data from the visit to our Instagram page is stored by Instagram and Facebook, to what extent Facebook complies with existing deletion obligations, what evaluations and links are made with the data on the part of Instagram or Facebook and to whom the data is passed on.

What personal data and thus information about the users of the Instagram and Facebook platform is obtained and how it is used is described by Instagram itself in general terms in its data use policy at <https://help.instagram.com/519522125107875>.

By using Instagram, your personal information will be collected, transferred, stored, disclosed, and used by Instagram and, in doing so, will be transferred to and stored and used in the United States, Ireland, and any other country in which Facebook conducts business, regardless of your country of residence.

Instagram and Facebook process on the one hand your voluntarily entered data such as name and username, email address, phone number.

On the other hand, Instagram and Facebook also evaluate the content you share to determine what topics you are interested in, store and process confidential messages you send directly to other users, and can determine your location using GPS data, wireless network information, or your IP address to serve you ads or other content.

Finally, Facebook also receives information when you view content, for example, even if you have not created an account. This so-called "log data" may be the IP address, browser type, operating system, information about the website you visited previously and the pages you viewed, your location, your mobile carrier, the terminal device you use (including device ID and application ID), the search terms you used and cookie information.

Through Instagram buttons or widgets embedded in websites and the use of cookies, it is possible for Facebook to record your visits to these websites and associate them with your Instagram profile. Based on this data, content or advertising can be offered tailored to you. You have options to restrict the processing of your data in the general settings of your Instagram account and under the item "Privacy and security".

More information on these items is available on the following Instagram support pages:

[www.instagram.com/accounts/login/?next=/accounts/privacy\\_and\\_security/](http://www.instagram.com/accounts/login/?next=/accounts/privacy_and_security/).

Furthermore, for the use of certain Facebook products, such as the so-called "Facebook Business Tools", and for data processing carried out as a result, an additional agreement between us and Facebook Ireland Ltd. as joint controller pursuant to Art. 26 DSGVO applies, which can be viewed here: [https://www.facebook.com/legal/controller\\_addendum](https://www.facebook.com/legal/controller_addendum).

#### 5. Data processing for statistical and marketing purposes ↔

Instagram provides us with page insights for our Instagram page. These are aggregated data that allow us to understand how people interact with our page. Page insights may be based on personal data collected in connection with a visit to or interaction with our site and its content. Pursuant to Art. 6 Para. 1 letter f) DSGVO, this serves to protect our legitimate interests in an optimised presentation of our offer and effective communication with customers and interested parties, which outweigh our interests in the context of a balancing of interests. You can object to the processing of your data for the aforementioned purposes at any time by changing your settings for advertisements in your Instagram user account at <https://www.facebook.com/settings?tab=ads> accordingly.

## 6. Rights of the data subject ↔

The applicable data protection law grants you comprehensive data subject rights (rights of information and intervention) vis-à-vis the controller with regard to the processing of your personal data, which we inform you about below:

- Right to information according to Art. 15 DSGVO;
- Right to rectification pursuant to Art. 16 DSGVO;
- Right to erasure in accordance with Art. 17 DSGVO;
- Right to restriction of processing pursuant to Art. 18 DSGVO;
- Right to information pursuant to Art. 19 of the DSGVO;
- Right to data portability according to Art. 20 DSGVO;
- Right to revoke consent given in accordance with Art. 7 para. 3 DSGVO;
- Right to lodge a complaint pursuant to Art. 77 of the DSGVO.

## 7. Right of objection in general ↔

If we process your personal data within the framework of a balancing of interests on the basis of our overriding legitimate interest, you have the right to object to this processing with effect for the future at any time for reasons arising from your particular situation. If you exercise your right to object, we will stop processing the data concerned. However, we reserve the right to continue processing if we can demonstrate compelling legitimate grounds for the processing which override your interests, fundamental rights and freedoms, or if the processing serves the assertion, exercise or defence of legal claims.

## Facebook

Status: 15.10.2021

### 1. Information about the collection of personal data and contact details of the person responsible ↔

In the following, we inform you about the handling of your personal data. Personal data is any data that can be used to identify you personally. Please check carefully which personal data you share with us via Facebook. As long as you are logged into your Facebook account and visit our Facebook profile, Facebook can assign this to your Facebook profile. We expressly point out that Facebook stores the data of its users (e.g. personal information, IP address, etc.) and may also use this for business purposes. You can find more information about Facebook's data processing in Facebook's privacy policy at <https://de-de.facebook.com/policy.php>.

We have no influence on the data collection and further processing by Facebook. Furthermore, it is not apparent to us to what extent, where and for how long the data is stored by Facebook, to what extent Facebook complies with existing deletion obligations, what evaluations and links are made with the data on the part of Facebook and to whom the data is passed on by Facebook. If you would like to prevent Facebook from processing personal data that you have transmitted to us, please contact us by other means.

The person responsible for data processing within the meaning of the General Data Protection Regulation (DSGVO) is Triangular-PST GmbH & Co. KG, Bahnhofstraße 35, 86316 Friedberg, Germany, Tel.: +49 821 4082 1442, e-mail: [datenschutz@triangular-pod.com](mailto:datenschutz@triangular-pod.com), insofar as we exclusively process the data transmitted to us by you via Facebook ourselves.

Insofar as the data you provide to us via Facebook is also or exclusively processed by Facebook (Insights data), Facebook Ireland Ltd, 4 Grand Canal Square, Grand Canal Harbour, Dublin 2 Ireland, is also the data controller within the meaning of the General Data Protection Regulation (GDPR) in addition to us. In this respect, the data processing takes place on the basis of an agreement between jointly responsible parties pursuant to Art. 26 DSGVO, which you can view here: [https://www.facebook.com/legal/terms/page\\_controller\\_addendum](https://www.facebook.com/legal/terms/page_controller_addendum).

Furthermore, for the use of certain Facebook products, such as the so-called "Facebook Business Tools", and for data processing carried out as a result, an additional agreement between us and Facebook Ireland Ltd. as joint controller pursuant to Art. 26 DSGVO applies, which can be viewed here: [https://www.facebook.com/legal/controller\\_addendum](https://www.facebook.com/legal/controller_addendum).

The controller is the natural or legal person who alone or jointly with others determines the purposes and means of the processing of personal data.

### 2. Contact Data Protection Officer Triangular-PST GmbH & Co KG ↔

Sven Lenz

German data protection law firm - Datenschutzkanzlei Lenz GmbH & Co KG  
Bahnhofstraße 50, 87435 Kempten, Germany

If you have any questions about data protection or other data protection concerns, you are welcome to send an e-mail to the following e-mail address: [datenschutz@triangular-pod.com](mailto:datenschutz@triangular-pod.com).

### 3. The Facebook Privacy Officer ↔

can be contacted via the online contact form provided by Facebook at <https://www.facebook.com/help/contact/540977946302970>.

### 4. Data processing when contacting ↔

We ourselves collect personal data when you contact us via contact form or messenger, for example. You can see which data we collect when you contact us via the contact form from the relevant contact form. This data is stored and used exclusively for the purpose of responding to your request or for contacting you and the associated technical administration. The legal basis for the processing of the data is our legitimate interest in responding to your request in accordance with Art. 6 Para. 1 letter f DSGVO. If your contact aims at the conclusion of a contract, the additional legal basis for the processing is Art. 6 para. 1 letter b) DSGVO. Your data will be deleted after final processing of your request, unless there are legal obligations to retain data. We assume that processing is complete if it can be inferred from the circumstances that the matter in question has been conclusively clarified.

### 5. Data processing for statistical and marketing purposes ↔

#### a. Page Insights ↔

Facebook provides us with so-called page insights for our Facebook page: <https://www.facebook.com/business/a/page/page-insights>. These are aggregate data that allow us to understand how people interact with our Page. Page insights may be based on personal data collected in connection with a visit to or interaction with our site and its content. Pursuant to Art. 6 Para. 1 letter f) DSGVO, this serves to protect our legitimate interests in an optimised presentation of our offer and effective communication with customers and interested parties, which outweigh our interests in the context of a balancing of interests. You can object to the processing of your data for the aforementioned purposes at any time by changing your settings for advertisements in your Facebook user account at <https://www.facebook.com/settings?tab=ads> accordingly.

#### b. Facebook Lead Ads ↔

We use the "Lead Ads" function of Facebook Ireland Limited, 4 Grand Canal Square, Dublin 2, Ireland ("Facebook"), in order to collect and process certain personal data of interested parties - so-called leads - via a contact form displayed on Facebook websites (so-called "Instant Form"). The content and scope of the data requested in this form depends on the focus of the respective lead campaign. The processing of the data is strictly bound to the purposes pursued with the respective Lead Ad campaign. These purposes are clearly stated in the Lead Ad or on the form provided before the data provided is transmitted. Depending on the orientation of the Lead Ad campaign, the legal basis for data processing is either your express consent pursuant to Art. 6 para. 1 letter a) DSGVO (e.g. for direct advertising measures such as registration for e-mail newsletter dispatch) or our legitimate interest in optimal marketing of our offer pursuant to Art. 6 para. 1 letter f) DSGVO. The data will not be passed on to third parties. As part of the aforementioned services, data transmitted via instant forms may be stored on servers of Facebook Inc, 1601 Willow Rd, Menlo Park, CA 94025, USA. Further information on data processing via Facebook Lead Ads can be found in Facebook's data policy at <https://de-de.facebook.com/privacy/explanation>.

#### c. Rights of the data subject ↔

The applicable data protection law grants you comprehensive data subject rights (rights of information and intervention) vis-à-vis the controller with regard to the processing of your personal data, which we inform you about below:

- Right to information according to Art. 15 DSGVO;
- Right to rectification pursuant to Art. 16 DSGVO;
- Right to erasure in accordance with Art. 17 DSGVO;
- Right to restriction of processing pursuant to Art. 18 DSGVO;
- Right to information pursuant to Art. 19 of the DSGVO;
- Right to data portability according to Art. 20 DSGVO;
- Right to revoke consent given in accordance with Art. 7 para. 3 DSGVO;
- Right to lodge a complaint pursuant to Art. 77 of the DSGVO.

### 6. Right of objection in general ↔

If we process your personal data within the framework of a balancing of interests on the basis of our overriding legitimate interest, you have the right to object to this processing with effect for the future at any time for reasons arising from your particular situation. If you exercise your right to object, we will stop processing the data concerned. However, we reserve the

right to continue processing if we can demonstrate compelling legitimate grounds for the processing which override your interests, fundamental rights and freedoms, or if the processing serves the assertion, exercise or defence of legal claims.

### 7. Duration of the storage of personal data ↔

The duration of the storage of personal data is determined on the basis of the respective legal basis, the purpose of processing and - if relevant - additionally on the basis of the respective statutory retention period (e.g. retention periods under commercial and tax law). When personal data is processed on the basis of explicit consent pursuant to Art. 6 para. 1 letter a) DSGVO, this data is stored until the person concerned revokes his or her consent. If there are statutory retention periods for data that is processed within the scope of legal or quasi-legal obligations on the basis of Art. 6 para. 1 letter b) DSGVO, this data will be routinely deleted after expiry of the retention periods, provided that it is no longer required for the performance of the contract or the initiation of the contract and/or there is no legitimate interest on our part in the continued storage.

When processing personal data on the basis of Art. 6 para. 1 letter f) DSGVO, this data is stored until the data subject exercises his or her right to object pursuant to Art. 21 para. 1 DSGVO, unless we can demonstrate compelling legitimate grounds for the processing which override the interests, rights and freedoms of the data subject, or the processing serves to assert, exercise or defend legal claims. When processing personal data for the purpose of direct marketing on the basis of Art. 6 para. 1 letter f) DSGVO, this data will be stored until the data subject exercises his or her right to object pursuant to Art. 21 para. 2 DSGVO. Unless otherwise stated in the other information in this statement about specific processing situations, stored personal data will otherwise be deleted when it is no longer necessary for the purposes for which it was collected or otherwise processed.

## Customer portal, project management and administration

### **Information on data processing according to Art. 13 DSGVO**

Status: 15.10.2021

#### 1. Responsibility for data processing ↔

Responsible for data processing is:

Triangular-PST GmbH & Co KG  
Bahnhofstraße 35  
86316 Friedberg  
Germany

#### 2. Legal basis and purpose of data processing ↔

We process your personal data only in compliance with the relevant data protection provisions. Your data will only be processed if the following legal permissions exist:

- for the fulfilment of our contractual services (Art. 6 para. 1 letter b) DSGVO)
- the processing is required by law (Art. 6 para. 1 letter c) DSGVO)
- with your consent (Art. 6 para. 1 letter a) DSGVO)
- on the basis of our legitimate interests (Art. 6 para. 1 letter f) DSGVO)

We use your data to answer inquiries or to contact you and communicate with you about the respective request as well as for processing within the scope of our contractual activities.

We store your data in our internal management programs, email program, as well as in various cloud solutions.

The responsible employees have access to your data. These employees may also be outside the EU. These accesses are regulated with a rights concept.

#### 3. Storage duration, or criteria for determining the duration ↔

We only retain the data you provide to us for as long as is necessary to fulfil the aforementioned purposes or as stipulated by the various storage periods provided for by law. For example, the retention period of your data can be derived from § 257 of the German Commercial Code (HGB) and § 147 of the German Fiscal Code (AO). Here, every merchant is required to keep commercial books for a period of 10 years, as well as commercial letters (including contract-relevant e-mails) for a period of 6

years. The retention period begins at the end of the calendar year in which the last entry was made in the commercial ledger or the commercial letter was received or sent.

If the respective purpose ceases to apply or after expiry of the relevant periods, your data will be routinely blocked or deleted in accordance with the statutory provisions.

#### **4. Passing on your data to third parties↔**

We only transfer your personal data to third parties if this is permitted by law or if you have given your consent.

We pass on your data to the following service providers for the purpose described in each case:

- Amazon Web Services - Storage of Data for Exchange
- Microsoft Cloud service - storage of data for exchange
- Google suites - storage of data for exchange
- Infusion Soft (CRM) - storage of data for digital marketing and newsletter distribution
- HubSpot (CRM) - storage of data for customer management

#### **5. Data transfer to a third country or an international organization↔**

By using the above mentioned services, a data transfer to a third country or an international organisation takes place.

#### **6. Right of withdrawal↔**

If the processing is based on consent, you have the option at any time to revoke the use of your data for internal purposes with effect for the future. For this purpose, it is sufficient to send a corresponding e-mail to [datenschutz@triangular-pod.com](mailto:datenschutz@triangular-pod.com). Of course, you also have the option of sending your revocation in writing by post to the following address Triangular-PST GmbH & Co KG, Bahnhofstr. 35, 86316 Friedberg or contacting us by telephone on +49 821 4082 1442.

#### **7. Reference to the respective data subject rights↔**

You have the right to obtain information about the personal data concerning you. You can also request the correction of incorrect data. In addition, under certain conditions, you have the right to have data deleted, the right to restrict data processing and the right to data portability.

#### **8. Contact details of the data protection officer↔**

Data protection law firm Lenz GmbH & Co KG  
Bahnhofstrasse 50, D-87435 Kempten  
Phone: +49 831 930653-00  
Email: [datenschutz@triangular-pod.com](mailto:datenschutz@triangular-pod.com)

#### **9. Reference to the right of complaint to the supervisory authority↔**

You have the right to complain to the competent data protection supervisory authority if you consider that the processing of your personal data is not lawful.

The address of the supervisory authority responsible for us is:  
Bayerisches Landesamt für Datenschutzaufsicht (BayLDA)  
Promenade 27, 91522 Ansbach, Germany  
Phone: +49 981 53-1300  
Fax: +49 981 53-981300

You can open the complaint form of the Bavarian State Office for Data Protection Supervision via the following link:  
<https://www.lda.bayern.de/de/beschwerde.html>.